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13 *Attorneys for Defendant*
Ditech Financial LLC
14 *formerly known as*
Green Tree Servicing LLC
15

16 UNITED STATES DISTRICT COURT
17 DISTRICT OF NEVADA

18 Lee C. Kamimura, individually and all
19 others similarly situated,

20 Plaintiff,

21 vs.

22 Ditech Financial LLC formally known
as Green Tree Servicing, LLC,

23 Defendant.
24

Case No. 2:16-cv-00783-APG-CWH

**JOINT STIPULATION AND
ORDER TO EXTEND DISCOVERY
DEADLINE**

(FIFTH REQUEST)

25 Plaintiff Lee C. Kamimura ("Plaintiff") and Defendant Ditech Financial LLC,
26 formally known as Green Tree Services LLC ("Defendant" and together with
27 Plaintiff, the "Parties") by and through their counsel of record hereby stipulate to
28

1 modify the Court's December 19, 2017 Order, ECF No. 46, to extend:

- 2 (1) The deadline to complete Phase Two discovery from January 31, 2018 to
3 February 21, 2018.

4 Pursuant to LR 26-4, the parties agree that good cause exists to amend the
5 Scheduling Order. The request is made due to an unforeseen delay in the deposition
6 of Defendant's expert John Ulzheimer. Due to inclement weather conditions in
7 Atlanta, the deposition needed to be postponed. The parties have rescheduled John
8 Ulzheimer's deposition to February 8, 2018. The parties have further agreed to
9 complete Plaintiff's expert's deposition by February 21, 2018. Further good cause
10 exists because the Parties continue to actively discussing resolution of this case and
11 certain discovery disputes. The Parties therefore require additional time in order to
12 complete expert discovery and to continue to meet and confer and discuss
13 resolution. The discovery extension is jointly requested by the Parties in good faith.

14 Pursuant to LR 26-4(a), the Parties have propounded written discovery
15 requests on each other and taken all necessary depositions, apart from the parties'
16 expert's depositions.

17 Pursuant to LR 26-4(a), the Parties need to conduct the depositions of both
18 parties' experts.

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1 Pursuant to LR 26-4(d), the Parties propose the following discovery schedule:
2 (1) The deadline to complete Phase Two discovery will be February 21, 2018.

3 For these reasons, the Parties jointly request that this Court modify the August
4 December 19, 2017 Order to provide an additional 21 days to complete discovery.

5 This is the Parties' fifth request for an extension of the discovery deadline.

6 DATED this 22nd day of January, 2018

7 KAZEROUNI LAW GROUP, APC
8

9
10 By /s/Michael Kind
11 Michael Kind, Esq.
12 6069 South Fort Apache Road, Suite 100
13 Las Vegas, Nevada 89148
Attorneys for Plaintiff

14 DATED this 22nd day of January, 2018

15 MCDONALD CARANO LLP
16

17
18 By /s/Laura R. Jacobsen
19 Laura R. Jacobsen, Esq.
20 100 W. Liberty St., 10th Floor
21 P.O. Box 2670
Reno, Nevada 89505

22 Attorneys for Defendant
23 Ditech Financial LLC formerly known as
Green Tree Servicing LLC

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28 ///

1 DATED this 22nd day of January, 2018

2 SEVERSON & WERSON
3 A Professional Corporation

4
5 By /s/ Donald H. Cram

6 Donald H. Cram
7 Laszlo Ladi
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10 Attorneys for Defendant
11 Ditech Financial LLC formerly known as
12 Green Tree Servicing LLC


13 **ORDER**

14 IT IS HEREBY ORDERED that the December 19, 2017 Order, ECF No. 46,
15 is modified to extend the discovery deadline as follows:

16 (1) The deadline to complete Phase Two discovery shall be February 21,
17 2018.

18 Dated: January 23, 2018

19 IT IS SO ORDERED.

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22 UNITED STATES MAGISTRATE JUDGE